



July 12, 2012

Office of Environmental Information Docket  
Docket # EPA-HQ-ORD-2012-0276  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

**RE: Wild Salmon Center's comments on the draft Bristol Bay Watershed Assessment**

Wild Salmon Center (WSC) applauds the U.S. Environmental Protection Agency (EPA) for undertaking a thorough scientific and technical assessment of the Bristol Bay watershed and its natural resources, which include North America's most productive wild sockeye fishery. WSC is an international conservation organization dedicated to the conservation and sustainable use of wild salmon ecosystems across the Pacific Rim. We identify science-based, pragmatic solutions to sustain wild salmonids and the human communities and livelihoods that depend on them.

WSC fully supports the EPA's watershed assessment findings and conclusion that large-scale mining will have adverse impacts on the productivity and sustainability of the salmon fishery in the watershed.

In finalizing the watershed assessment, we request EPA fully consider the attached report prepared by WSC and Trout Unlimited entitled, "*Bristol Bay's Wild Salmon Ecosystems and the Pebble Mine: Key Considerations for a Large-Scale Mine Proposal*." The report, published in January 2012, evaluates the potential impacts on wild salmon ecosystems posed by large-scale mining in the Bristol Bay watershed, and describes additional related concerns with the proposed Pebble Mine. The attached report is available online here:  
<http://www.wildsalmoncenter.org/pdf/PM-Report.pdf>.

Based on our own report findings, which reinforces the EPA's draft watershed assessment findings, we conclude that the Pebble Mine, as preliminarily proposed, will degrade the basin's aquatic and terrestrial ecosystems and adversely impact the region's world class salmon fishery. While mine proponents will go to great lengths to assure the public that the mine will result in no net loss of salmon resources, no mine of Pebble's massive scale has operated successfully in a sensitive aquatic ecosystem long enough to make this claim. We believe there is too much at stake to conduct an experiment of this scale with a resource of Bristol Bay's economic, ecological, and cultural value.

INTERNATIONAL HEADQUARTERS

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WSC urges the EPA to protect Bristol Bay's wild salmon fishery by invoking its authority under Section 404(c) of the Clean Water Act and withdraw the watershed as a disposal site for dredge and fill activities.

Thank you for conducting the assessment and for accepting these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Guido', with a long horizontal stroke extending to the right.

Guido Rahr  
President & Chief Executive